

**PREPARED DIRECT TESTIMONY  
OF  
ROBIN L. TURNER  
ON BEHALF OF  
CENTRAL ILLINOIS LIGHT COMPANY  
DOCKET NO. 01-  
  
CILCO EXHIBIT 2.0**

**PREPARED DIRECT TESTIMONY  
OF  
ROBIN L. TURNER  
ON BEHALF OF  
CENTRAL ILLINOIS LIGHT COMPANY  
DOCKET NO. 01-**

**Table of Contents**

Witness Identification.....	1
Purpose of Testimony.....	2
Overview of Existing Delivery Service .....	3
Underlying Organization of Proposed Tariffs.....	5
Discussion of Proposed Riders.....	8
Modifications to Existing Provisions .....	10
Conclusion.....	13

**PREPARED DIRECT TESTIMONY  
OF  
ROBIN L. TURNER  
ON BEHALF OF  
CENTRAL ILLINOIS LIGHT COMPANY  
DOCKET NO. 01-**

**Witness Identification**

1

2 Q1: Please state your name and business address.

3 A1: My name is Robin L. Turner, and my business address is 300 Liberty Street,  
4 Peoria, Illinois 61602.

5 Q2: What is your current position at Central Illinois Light Company?

6 A2: I am employed by Central Illinois Light Company as Staff Rates Administrator.

7 Q3: What is your educational background and work experience?

8 A3: I was graduated from Western Illinois University in 1975 with a Bachelor of  
9 Science degree in Mathematics and from Bradley University with a Master's  
10 degree in Business Administration in 1985.

11 In 1976 I was employed by Central Illinois Light Company (CILCO or the  
12 Company), and in 1978 I became a member of the Rates and Regulatory Affairs  
13 Department as a Rates Analyst. I was subsequently promoted to Rates and  
14 Research Administrator in 1981, to Senior Rates Administrator in 1983, and to  
15 Supervisor, Regulatory Affairs in 1985. In January 1999, my position was  
16 renamed as Staff Rates Administrator.

17 In my current capacity, I am responsible for planning and conducting rate-  
18 related studies and research, performing various regulatory-related activities, and  
19 coordinating rate administration activities.

20 I have previously testified before this Commission on CILCO's behalf in  
21 other rate-related proceedings.

22 **Purpose of Testimony**

23 Q4: Please explain the purpose of your testimony.

24 A4: Within my testimony I will provide a narrative description of the Company's  
25 filing. That is, I will highlight modifications that CILCO has made to its Delivery  
26 Service related rates, riders, and General Terms and Conditions for Electric  
27 Service to incorporate the uniform outline and to implement Delivery Service for  
28 residential customers.

29 I will explain the eligibility requirements, how the rates and riders  
30 interrelate, and general provisions of the rates and riders.

31 Q5: Have you prepared exhibits to which you will refer?

32 A5: Yes, I will sponsor CILCO Exhibits 2.1 through 2.10. The proposed tariffs for  
33 Delivery Service, Rate RDS and Rate NDS are contained in CILCO Exhibits 2.1  
34 and 2.2, respectively. Rate RESS is contained in CILCO Exhibit 2.3, and Rate  
35 MSP is contained in CILCO Exhibit 2.4. The various riders that CILCO is  
36 proposing are contained in Exhibits 2.5 through 2.9. CILCO Exhibit 2.10  
37 contains other sheets from CILCO's rate book that will change as a result of this  
38 filing. Such sheets include the Table of Contents, Index of General Terms and  
39 Conditions, sheets that contain references to Section 7, and blank sheets that will  
40 remove Sections 6 and 7 and Riders DST 1, DST 2, and DST 3 from CILCO's  
41 Schedule of Rates.

**Overview of Existing Delivery Service**

Q6: Ms. Turner, will you please describe the purpose of CILCO's existing Delivery Service offering?

A6: In accordance with Section 16-104 of the Public Utilities Act and pursuant to Illinois Commerce Commission order, CILCO has in place tariffs that implement Non-Residential Delivery Service. As such, these tariffs are available to non-residential, retail customers in the Company's service territory and were designed specifically for that purpose. That is, Delivery Service (or open access) for residential customers is not addressed. Delivery Service provisions for non-residential customers can be found in several rates, riders, and terms and conditions in CILCO's Schedule of Rates for Electric Service, Ill. C. C. No. 9 - Electric.

Q7: What tariffs does CILCO currently have in place for Delivery Service?

A7: CILCO's current rates, riders, and General Terms and Conditions for non-residential Delivery Service are contained in Rates 35, 36, and 37; Riders DST 1, DST 2, and DST 3; and Section 6 of the General Terms and Conditions for Electric Service. Provisions related to the provision of Metering Service can be found in Section 7 of the General Terms and Conditions. With the exception of provisions that set forth the bundled service bill facsimiles, residential extensions, temporary service, fuel cost adjustment, and level payment plan, the Company's remaining General Terms and Conditions for Electric Service are applicable to Delivery Service. Company-provided services related to Delivery Service and Metering Service are set forth in "Rate 36, Company-Provided Services."

65 Q8: Ms. Turner, will you please describe CILCO's existing Delivery Service  
66 provisions?

67 A8: Yes. Section 6, "Delivery Services," of the General Terms and Conditions for  
68 Electric Service sets forth items that generally apply to Delivery Service. The  
69 following items are addressed: definitions of related terms, release of customer  
70 information, letter of agency, customer enrollment, requirements for Customer  
71 Self Managers, switching, declaration of a service as being competitive,  
72 unauthorized use, transition charges, non-compliance with rate and rider  
73 provisions, early termination by small commercial customers, and supplier  
74 registration.

75 "Rate 35, Non-Residential Delivery Services," and "Rate 37, Non-  
76 Residential Delivery Services with Power Purchase Option," set forth the  
77 parameters of Delivery Service for all non-residential customers. Rate 35 and  
78 Rate 37 are similar. Rate 35 is available to all non-residential customers who  
79 elect to purchase all or a portion of their power and energy supply requirements  
80 from the Company while purchasing the balance from an alternate supplier. Rate  
81 37 is available for customers that elect to utilize the Power Purchase Option for all  
82 or a portion of their power and energy requirements.

83 Riders DST 1, DST 2, and DST 3 set forth distribution rates, transmission  
84 rates, and transition charges, respectively. These riders, applicable to Rates 35  
85 and 37, are a necessary part of Delivery Service as they set forth the provisions  
86 and pricing of the above-mentioned elements.

87 Q9: Does CILCO's current Schedule of Rates have provisions for Metering Service  
88 Providers?

89 A9: Yes, provisions for customers electing to use an alternate provider of metering  
90 service are set forth in Section 7, "Metering Services for Delivery Services," of  
91 the General Terms and Conditions. These provisions in combination with 83  
92 Illinois Administrative Code, Part 460, and CILCO's Metering Service Provider  
93 Operating Procedures set forth the requirements for Metering Service Providers.  
94 The terms and conditions contained Section 7 were approved by the Commission  
95 in ICC Docket No. 99-0013.

96 Q10: Will the Company retain these items in its Schedule of Rates?

97 A10: No, each of these items will be removed from CILCO's rate book and, where  
98 appropriate, the provisions have been incorporated into the proposed rates and  
99 riders.

100 **Underlying Organization of Proposed Tariffs**

101 Q11: Please review the underlying organization and structure of the Company's  
102 proposed delivery service tariffs?

103 A11: With this petition the Company is seeking permission to revise and replace its  
104 current rates, riders, and terms and conditions of Non-Residential Delivery  
105 Service with new rates and riders. The approval of a new rate that will make  
106 Delivery Service available to all residential customers beginning May 1, 2002, in  
107 accordance with the Customer Choice Law is also sought. The proposed rates and  
108 riders incorporate provisions of the existing rates, riders, terms and conditions.

109               Currently, the provisions related to Delivery Service appear in various  
110               locations within CILCO's rate book. Therefore, the Company is also proposing to  
111               group the new rates and riders at the end of the Schedule of Rates.

112     Q12:   You mentioned that the proposed tariffs for Delivery Service are Rates RDS and  
113               NDS. Please describe the format of these tariffs.

114     A12:   CILCO is proposing to place into effect two separate tariffs for Delivery Service.  
115               These rates, one for residential and one for non-residential customers, have been  
116               titled "Rate RDS, Residential Delivery Service" (Rate RDS) and "Rate NDS,  
117               Non-residential Delivery Service" (Rate NDS). Rate RDS is contained in CILCO  
118               Exhibit 2.1, and Rate NDS is contained in CILCO Exhibit 2.2.

119               Each of the rates contains a description of the Delivery Service that is  
120               available pursuant to it, the service options available for the eligible customers,  
121               definitions of terms used in the rate, special terms and conditions applicable to  
122               Delivery Service, applicable riders, and the rates and charges applicable to the  
123               Delivery Service. Many terms and conditions in the two rates are the same as  
124               those previously approved by the Commission for non-residential customers.

125     Q13:   What are the various riders that the Company is proposing be placed into effect?

126     A13:   In addition to Rate RDS and Rate NDS, the Company is incorporating the  
127               following riders that are applicable to Delivery Service: "Rider ISS, Interim  
128               Supply Service" (Rider ISS), "Rider PRS, Partial Requirements Service" (Rider  
129               PRS)," Rider SBO, Single Billing Option" (Rider SBO), "Rider TS, Transmission  
130               Service" (Rider TS), and "Rider MS, Metering Service" (Rider MS). I will  
131               briefly discuss each of these later in my testimony.



132 Q14: What other changes to the organization of CILCO's rate book are included with  
133 this filing?

134 A14: As I previously mentioned, there are two sections within the Company's General  
135 Terms and Conditions that address Delivery Service and Metering Service. With  
136 this filing, the Company is proposing the incorporation of these General Terms  
137 and Conditions into separate riders and/or into the rates themselves. It is  
138 generally replacing Section 6, "Delivery Services," and Section 7, "Metering  
139 Services for Delivery Services," with "Rate RESS, Retail Electric Supplier  
140 Service" (Rate RESS), and "Rate MSP, Metering Service Provider" (Rate MSP),  
141 respectively.

142 Q15: Has the Company included provisions related to the recovery of transition costs in  
143 its new proposal?

144 A15: No. Subsequent to the approval of the Company's "Rider DST 3, Customer  
145 Transition Charge and Market Value Determination" and its "Non-Residential  
146 Delivery Services with Power Purchase Option Rate 37," the Company chose not  
147 to collect transition charges by not implementing Rider DST 3. Therefore, Rider  
148 DST 3 and its provisions as well as the provisions regarding the Power Purchase  
149 Option that are contained in Rate 37 are being removed from CILCO's Schedule  
150 of Rates. If the Company elects in the future to collect transition charges, a new  
151 filing will be made at that time.

152 Q16: Has the Company adhered to the uniform outline that was adopted by the  
153 Commission and attached to the Commission's March 21, 2001, order in Docket  
154 No. 00-0494?

155 A16: Yes, the organization of the Delivery Service and Metering Service tariffs and  
156 related riders reflects and conforms to the supplier and customer tariff outlines  
157 that were approved in Docket No. 00-0494.

158 Q17: Please explain how the Company has utilized the terms and the uniform  
159 definitions that are being developed.

160 A17: The Company has expanded the listing of terms that appear in its Delivery  
161 Service and Metering Service tariffs to include terms that are pertinent to  
162 CILCO's tariffs. In many instances the definitions are consistent with those that  
163 have been developed thus far.

164 **Discussion of Proposed Riders**

165 Q18: Please describe Rider ISS.

166 A18: Rider ISS, as discussed by CILCO Witness Seelye, is applicable to Rates RDS  
167 and NDS and provides for the short-term supply of electric power and energy  
168 from CILCO for customers that have lost their alternate source of supply. This  
169 rider, which sets forth a voluntary service, was derived from the provisions set  
170 forth in Rate 35 for Backup Supply Service and Interim Supply Service. A copy  
171 of the proposed rider is contained in CILCO Exhibit 2.5.

172 Q19: What is the purpose of Rider PRS, Partial Requirements Service?

173 A19: Section 16-104(e) of the Public Utilities Act specifies that a retail customer that is  
174 eligible to elect Delivery Service may place all or a portion of its electric power  
175 and energy requirements on Delivery Service. It further specifies that such  
176 service is subject to the terms and conditions the electric utility is entitled to  
177 impose. Rider PRS, which is applicable to Rate RDS and Rate NDS, implements

those provisions of the Act. A copy of Rider PRS is contained in CILCO Exhibit 2.6.

Provisions for Partial Requirements for non-residential customers are currently included in Rate 35 under the heading "Alternative Supply Less than 100% of the Customer's Load."

Q20: How has the Company chosen to set forth the provisions related to Single Billing?

A20: These provisions which are currently addressed in Rate 35 under the heading "Single Billing" can be found in "Rider SBO, Single Billing Option" (Rider SBO). Rider SBO is included in CILCO Exhibit 2.7.

Service pursuant to Rider SBO is available to any entity that is authorized to provide power and energy to customers in the Company's service territory provided the customer's Delivery Service is provided pursuant to Rate RDS or Rate NDS. However, Single Billing cannot be utilized by Customer Self Managers or when a retail customer is receiving service pursuant to Rider ISS or Rider PRS.

CILCO Witness Frommelt discusses Rider SBO and its provisions.

Q21: What is the purpose of Rider TS?

A21: Rider TS, which can be found in CILCO Exhibit 2.8, replaces the Company's existing Rider DST 2, "Transmission, Ancillary, and Real Power Loss Service Rates." Minor modifications were made for clarification and the format was changed to adhere to the uniform outline. As was the case with Rider DST 2, the new rider has been included to generally apprise the customer of the FERC tariffs governing transmission services. Charges, as specified in the applicable OATT,

201 for transmission service and any related services will be billed to the party  
202 requesting the service. Consequently, the supplemental information sheet has  
203 been eliminated.

204 Q22: Please briefly discuss Rider MS.

205 A22: Rider MS, contained in CILCO Exhibit 2.9, is applicable to Rate RDS and Rate  
206 NDS. The rider, as more fully explained by CILCO Witness Stillson, sets forth  
207 the rates and charges for any metering and related equipment that CILCO  
208 provides to a Delivery Service customer. Currently, rates and charges are set  
209 forth in Rate 35 under the "Meter Charge."

210 **Modifications to Existing Provisions**

211 Q23: Has the Company introduced changes to the rate structure that it utilizes in  
212 existing Rate 35?

213 A23: Yes, as more fully explained by CILCO Witness Stillson, the Company has  
214 introduced new rate classes within its tariffs. These rate classes for both  
215 residential and non-residential Delivery Service are based on voltage level. The  
216 charges, as explained by CILCO Witness Bilsland, have been updated to reflect  
217 the Company's current jurisdictional revenue requirement for Delivery Service.

218 Q24: Have various charges and fees for separate services that CILCO provides been  
219 modified?

220 A24: As explained by CILCO Witness Sick, some of the separate fees for services that  
221 CILCO provides have been updated to reflect the cost of providing the service.  
222 The Company has also proposed administrative fees to cover the administrative  
223 cost related to customers returning to bundled service.

224 Q25: How have provisions been modified for customers that return to bundled service?

225 A25: As permitted by Section 16-103(d) of the Public Utilities Act, the Company is  
226 requiring small non-residential customers, to remain on bundled service for a  
227 minimum period of twenty-four consecutive months. That is, any small non-  
228 residential customer that returns to bundled electric service will not be eligible for  
229 service under Rate NDS for a period of twenty-four consecutive monthly billing  
230 periods. Similar provisions applicable to residential customers have been  
231 included in Rate RDS.

232 Q26: Has the Company made any changes regarding the ability of Delivery Service  
233 customers to utilize the level pay plan?

234 A26: Yes, it has. Currently, Delivery Service customers are not allowed to participate  
235 in the Company's Level Payment Plan (LPP). The LPP provisions are set forth in  
236 Section 5.130 of the General Terms and Conditions for Electric Service. This  
237 filing removes Section 5.130 from the listing of General Terms and Conditions  
238 that are not applicable to Rate RDS and Rate NDS. All customers, including  
239 those for whom Single Billing is provided by the customer's supplier, are eligible  
240 to enroll in the Company's Level Payment Plan.

241 As stated on Sheet No. 132 of CILCO Exhibit 2.7, "The Company will  
242 continue to offer Level-Pay and other payment arrangements to its customers for  
243 Delivery Service charges, whether directly billed or billed via Single Billing."

244 Q27: What changes have been included regarding Single Billing?

245 A27: As specified in the testimony of CILCO Witness Frommelt, the level of the credit  
246 for a customer whose supplier chooses to perform Single Billing has been

247 modified. The Company has eliminated provisions that would enable a supplier  
248 to assume responsibility for the accounts receivable.

249 Q28: What adjustments has the Company proposed with respect to distribution losses.

250 A28: The distribution loss factors, which are currently set forth in Rider DST 1, have  
251 been updated to reflect the result of the Company's recently completed loss study.  
252 Since Rider DST 1 is being eliminated, the Company is proposing to include the  
253 applicable factors in Rates RDS and NDS.

254 Q29: What changes have been made to the pricing of power and energy supply that is  
255 supplied by CILCO when a customer elects Partial Requirements Service?

256 A29: Pricing for power and energy that the Company provides for Partial Requirements  
257 has been modified to be consistent with the pricing of proposed Rider ISS.

258 Q30: What modifications is the Company proposing for its Metering Service Provider  
259 rate?

260 A30: The Company has included the rates and charges that would be assessed when a  
261 joint meet is required. The following sections related to costs incurred for a joint  
262 meet have been included: Metering Equipment Removal Charges, MSP-  
263 Requested Work Charges, and Lost Equipment Charges. The testimony of  
264 CILCO Witness Stieghorst addresses how these charges were derived.

265 Q31: Please describe the changes that were made to the sheets included in Exhibit 2.10.

266 A31: CILCO is revising the Table of Contents to delete the references to Riders DST 1,  
267 DST 2, and DST 3, and to include listings for the new rates and riders. The  
268 proposed revisions to the "Index to General Terms and Conditions" remove the  
269 references to Section 6.

270 The reference to “Section 7 of the General Terms and Conditions” that  
271 appears on Sheet Nos. 14, 15, 15.1, and 22, has been revised to read “Rate MSP,  
272 Metering Service Provider.”

The blank sheets, as I previously mentioned, remove the provisions  
Section 6 and 7, and Riders DST 1, DST 2, and DST 3 from the Company's  
Schedule of Rates since these provisions have been incorporated, where  
appropriate, in the new rates and riders.

277 **Conclusion**

278 Q32: Ms. Turner, does this conclude your prepared direct testimony?

279 A32: Yes, it does.